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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

INDEPENDENT ROOFING )  
CONTRACTORS COUNCIL )  
APPRENTICESHIP TRAINING TRUST )  
FUND *ex rel*, ROYAL ROOFING, INC., )  
Petitioner, )  
v. )  
ELAINE CHAO, in her official capacity as )  
Secretary of Labor, and the UNITED )  
STATES DEPARTMENT OF LABOR, )  
Respondents,  
ROOFERS UNION LOCAL NO. 81,  
Intervenor.

Case No. C 05-03605 JW (HRL)

**STIPULATION AND ~~PROPOSED~~  
ORDER CONTINUING CASE  
MANAGEMENT DEADLINES**

The parties to this action hereby stipulate and request as follows:

Plaintiff filed this action on September 7, 2005. The Office of the United States Attorney was served on March 13, 2006, and the defendant's response to the complaint is due on May 12, 2006. This case is currently scheduled for a case management conference on March 27, 2006. This date is several weeks prior to the current deadline for responding to the complaint.

Accordingly, the parties request that the case management conference be rescheduled to May 15, 2006, or a later date acceptable to the Court. The parties further request that the

1 deadline for the parties to file a Joint ADR Certification with Stipulation to ADR process or  
2 Notice of Need for ADR Phone Conference be extended to April 24, 2006, that the deadline for  
3 filing a joint case management statement be continued to May 8, 2006, and that the deadline to  
4 complete initial disclosures or state objection in a Rule 26(f) report be extended to the date of the  
5 case management conference.

6 IT IS SO STIPULATED.

7 Respectfully submitted,

8 DATED: March 20, 2006

KEVIN V. RYAN  
United States Attorney

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10  
11 /s/ Claire T. Cormier  
CLAIRE T. CORMIER  
Assistant United States Attorney

12  
13 THIERMAN LAW FIRM

14  
15 DATED: March 17, 2006

/s/ Mark Thierman  
MARK THIERMAN  
Attorneys for Petitioner

17  
18 WEINBERG, ROGER & ROSENFELD

19  
20 DATED: March 20, 2006

/s/ Caren P. Sencer  
CAREN P. SENCER  
Attorneys for Intervenor

21  
22 **PROPOSED ORDER**

23 Pursuant to the stipulation of the parties and good cause appearing, IT IS SO ORDERED.

24  
25 DATE: March 21, 2006

26   
JAMES WARE  
United States District Judge